

**THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

LAURI VALJAKKA,

Plaintiff

v.

NETFLIX, INC.,

Defendant.

CASE NO. 6:21-cv-00947-ADA

**DECLARATION OF JANICE L. TA IN SUPPORT OF DEFENDANT NETFLIX,
INC.'S MOTION TO DISMISS FOR IMPROPER VENUE, OR IN THE
ALTERNATIVE, TRANSFER TO THE NORTHERN DISTRICT OF
CALIFORNIA**

I, Janice L. Ta, declare and state as follows:

1. I am an attorney at Perkins Coie, LLP and counsel of record for Defendant Netflix, Inc. (“Netflix”). I am an attorney at law licensed to practice in the State of Texas.

2. This Declaration is submitted in support of Defendant’s Motion to Dismiss for Improper Venue, or in the Alternative, Transfer to the Northern District of California.

3. The following are relevant prior art inventors who reside in the Northern District of California:

a. Deng Cheng

b. Michael Albanese

4. Netflix intends to call the above as witnesses if this case proceeds to trial.

5. Attached as Exhibit 1 is a true and correct copy of excerpts from the United States District Courts National Judicial Caseload Profile. As shown in the chart, the median time in months from filing to trial for civil cases in the Western District of Texas for the 12-month period ending on June 30, 2021, was 23.8 months. The corresponding data for the Northern District of California was 26.9 months.

6. I have personal knowledge of the facts set forth in this Declaration and, if called to testify as a witness, could and would competently do so under oath.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED this 13th day of December 2021, in Austin, Texas.

/s/ Janice L. Ta

JANICE L. TA